

THE CONFERENCE REPORT

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I

AVAILABILITY OF LEGAL EDUCATION AND PLACEMENT OF LAW GRADUATES

The policies of a university toward broadening educational opportunities and those concerned with placing its graduates might be expected to take some account of each other. Gratuitous advice on such policies might accordingly be asked to qualify itself by demonstrating a corresponding consistency. Thus it seems a serious defect that this Conference's proceedings were conducted in compartments, "panels" which met without opportunity to reconcile their own conclusions with those reached by other panels. It is both a happy fact and one that lends weight to the Conference's opinions that the panel on The Availability of Legal Education and that on Placement of Law School Graduates achieved a discernible degree of consistency in their conclusions on related matters.

The Availability panel subdivided its topic into (1) the problems facing an individual seeking a legal education and (2) problems and policies of the institution. The Placement panel discussed, first, objectives of a law school placement program, and then means of attaining them.

A. Problems of the Individual

To the delegates, financial cost was the central problem for the individual seeking legal education. They did not regard time—the length of the course of study—as significant in itself; it was even suggested that the veteran, already set back four to six years, was not as eager to make up lost time as some have assumed. But since a longer course increases costs, it is significant as a cost factor.

Indeed, the cost of subsistence, rather than tuition, fees, and books, loomed larger in the panel discussion than it might to students in fields other than law. The formidable study load and the attitude of most schools operate to discourage part-time employment as an offset to the subsistence cost of law study. And, if the post-war increase in the proportion of married students in law schools continues past the period of veteran enrollments, subsistence cost will continue to have an importance never assigned to it in pre-war days. A paper submitted by the Uni-

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versity of Washington delegation estimated that a single male student at that university, living in dormitories, could subsist on a minimum of \$585 per academic year; an unmarried woman would require \$810. However, a childless married couple who, of course, would not have dormitory facilities, would need \$1800 to maintain themselves in decency for that period. Consequently the panel favored, as a major contribution to the reduction of costs, the continuation of the accelerated program, which enables the student to complete the three-year course in two calendar years, and its introduction in schools which have not tried it or no longer continue it. At the University of Pittsburgh, its representatives reported, a compromise plan offers the three-year course in two and one-half calendar years; one-half of a normal semester's load will be offered in each summer so long as there is a substantial demand. As this makes it profitable for a married student to maintain a year-round residence at the school, it admirably serves the purpose of reducing costs.

An even greater departure from pre-war traditions was suggested in the proposal that university law schools develop part-time or night-school programs in addition to their full-time courses. "For those individuals who cannot participate in full-time legal education because of the financial problem" after other institutional aids to them have been exhausted, may not "part-time legal education be a solution?" The discussion, which culminated in an affirmative answer, centered upon the lower prestige normally attaching to a part-time school's degree. "The university schools look down their noses at these 'local' schools, despite the fact that some of our ablest, most successful, and most nationally public-spirited lawyers—Randolph Paul and Morris Ernst, for instance—were graduated from such institutions."¹ To make legal education available to all who qualify, this prestige obstacle to the night-school solution must be overcome. The delegates suggested: (1) that schools offering both

¹ Circuit Judge Jerome Frank in an address at the concluding dinner. Suggesting that the prestige differential might properly be reversed, he said: "Some persons believe it will be easier to produce a satisfactory, well-rounded legal education by supplementing the curriculums of the local schools than by revising the studies at the university schools, remote as the latter are from lawyerdom. The former, it is argued, are already closer to the essentials of a sound legal education. Many of their teachers are, or once were, in active practice; they therefore have no fear of the realities. Most of the students, in their out-of-school hours, perforce have daily direct contacts with the lawyer laboratories. I earnestly suggest to this conference that it consider carefully whether those schools could be transformed into admirable apprentice schools. If such a school were to call in as teachers some of its present alumni and were to supplement its present courses with some first-rate courses in psychology, history, political science, economics, ethics, and anthropology, it might well be a path-maker to a good legal education. Those of you about to practice in a large city might take a hand in streamlining such a school." See Frank, *A Plea for Lawyer Schools*, 56 *YALE L.J.* 1303, 1342 (1947).

full-time and part-time programs should maintain equally high standards in both divisions, and (2) that when a student transfers from a part-time program in such a school his credits should be given equal weight with credits earned in full-time study. It was felt that such practices are at present rare.

As further institutional aids to reducing the cost obstacle, the panel favored the provision of low-cost housing for married students, establishment of student employment services with provision for consultations for incoming students on cost problems, and increased funds for scholarships and grants-in-aid.

In the matter of low-cost housing, the University of Washington appeared to the delegates to have set the pace for law schools. With an expenditure of \$1,745,000, "200 family units were purchased outright by the University and the site for an additional 300 family units was prepared, the units themselves being provided by the Federal Government, under the authority of the Lanham Act.² Of this the major portion, which was spent in the acquisition of permanent family housing, is expected to be completely amortized by the rent in 15 years."³ Rent for these units ranges from \$30 to \$45 per month, contrasting with comparable private rents of about \$75. Other schools also reported major outlays for housing married students, but in many cases the effort was purely an emergency one and the expenditure was consequently limited by the lack of a prospect of complete amortization. For that reason some considered the Washington example inapplicable to their schools because local conditions differed. But just as the provision of dormitory facilities for single students has become widely accepted, so the new need for family housing may justify widespread provision for it by universities. If it is uncertain whether the need will last, it is nevertheless true that provision for married students may contribute to making the temporarily high proportion of them permanent.

Establishment of student employment services was advocated in the face of the known difficulties in the way of combining law study and part-time employment. The delegates believed that some of the objections to the combination would be met if the employment were associated with professional work. Thus a function of the proposed employment services would be to channel students into work of educational value to them, to whatever extent the locality affords opportunity for such employment. Moreover, even though such opportunities may be wholly inadequate, the employment services could minimize the diversion from legal pursuits by insuring that whatever outside employment

² 54 STAT. 1125 (1940), as amended, 42 U.S.C. § 1521 *et seq.* (Supp. 1946).

³ *The Availability of Legal Education*, Washington delegation paper, p. 6.

is taken is as profitable as possible. Finally, the panel felt that a faculty member associated with the student employment agency and experienced in advising students on financial problems would be able to aid the entering students in appraising the adequacy of their personal finances and might succeed in preventing many frustrations and some unnecessary interruptions of law study.

The panel divided on the proposition that federal aid should be extended to law students in some form after the veteran enrollments have passed. Delegates supporting federal aid urged that the position of the legal profession in forming national thought and controlling public institutions touches professional training with a public interest and that the social desirability of adequate representation of lower economic classes by their own members justifies use of public funds to achieve it. More broadly, the proponents argued that the aim of national educational policy should be to make higher education as freely available to qualified students as high-school education now is. In opposition, delegates urged that the remote possibility of adopting such a plan made discussion academic, that a desirable subsidy would be accompanied by undesirable federal control, and that the problem of educating the needy is merely part of the larger problem of poverty which demands a general economic solution and "not picking people from that status and raising them by Government subsidies." Finally, some urged that "any American boy today who really wants to can go to law school" and "while it may take him a few extra years, it is not going to hurt him if he really has to go to work and earn his tuition." Despite comment that many of these adverse arguments were far from conclusive (witness, for instance, the admitted freedom of colleges and universities from federal control under the administration of the Servicemen's Readjustment Act), the panel failed to reach agreement on a federal subsidy to legal education.⁴

B. Problems of the Institution

In the field of strictly institutional problems affecting availability, the panel devoted considerable attention to the present overtaxing of school facilities. Already the pressure, widely viewed as temporary, has outlasted earlier predictions of its peak and duration. "Should we refuse to accommodate" the influx and maintain our standards, "or should we discommode ourselves and accommodate all? Or what compromise should be struck between" these alternatives? Delegates from Pennsylvania and Yale stated, without indorsement, the determination of

⁴ Probably an unstated reason for its indecision was a feeling that the proposal was somewhat beyond the scope of the panel's work.

their schools to "get back to normal conditions" despite high demand. The policies of Michigan, Pittsburgh, and Washington were held up as representative of the opposite point of view. Some delegates expressed doubt as to the wisdom of larger classes as an expedient for accommodating larger enrollments; they preferred to have classroom facilities employed for longer hours, temporary housing for classrooms obtained, and faculties correspondingly overtaxed or enlarged. The consensus favored "the continuation of intensive use of law school facilities for the period in which the burden on law schools continues to be intense, so long as it does not *seriously* impair the academic standards of the schools." The italicized adverb in the qualifying clause took the panel, it was felt, well beyond the positions of Pennsylvania and Yale.

The panel discussed two aspects of admission policies: discrimination in admissions and the influence of economic factors on policy.

A proposition favoring the complete elimination of discrimination against any race, creed, or sex in the admissions policies of all law schools received apparently unanimous support after modification to yield to two special interests. A lively discussion precipitated by a Harvard delegate led to the deletion of the reference to sex, out of a deference for him that was probably greater than either he or his school would have seriously sought.⁵ And a suggestion that policies of sectarian schools which discriminate in favor of their own sect escape the condemnation of the panel was readily conceded. The panel proceeded to develop various methods of implementing this non-discrimination proposition: withdrawal of state tax exemptions, withdrawal of state and federal subsidies, and withdrawal of recognition by the Association of American Law Schools from institutions whose law schools discrimin-

⁵ "MR. HENDRICKSON: I think there may be a difference in degree in the question of discriminating in women—if you want to call it that. I do not suppose we feel we should subject them to the rigors of Harvard Law School, out of gallantry rather than anything else. Also, it has been suggested that—well, it is an old law school and at the time it began, I guess, no provision was made for women there. So nothing has been done about it.

"CHAIRMAN SILVERMAN: The gentleman from Harvard suggests that it is to the best interests of women not to come into the activities of Harvard—and the plumbing facilities are bad, too.

"MR. HENDRICKSON: The question was raised in 1899. A Radcliffe girl was anxious to spend some more time around there and it was raised at the Law School. And over the vigorous objections of Langdell and Ames, the faculty said that women should be admitted; and J. Thayer, who gave the report of the committee, said: 'We cannot deny the justice of their claim.' But it came to the Board of Overseers of Harvard College and somehow it was pigeonholed and never got out.

"CHAIRMAN SILVERMAN: Is it your understanding that Harvard may yet dust that recommendation off—1890, you said?

"MR. HENDRICKSON: About 1899."

A Detroit delegate changed the subject.

ate in their admissions policies. Again a concession was made in favor of schools located in states where their particular form of discrimination is required by law, and after this concession the suggested sanctions met the consensus of the panel.

The delegates felt that considerations of the market for lawyers influenced admissions policy in many law schools and that an examination of the merits of such considerations would be valuable. The Washington paper took the position that the purpose of law schools should be "to make legal education available to as many as possible" rather than to maintain "a lawyer's 'scarcity value' by limiting the opportunities for legal training." It proposed that admissions policy should be governed by a consideration of the applicant's pre-legal scholastic achievements and personal qualifications. Such a policy should be designed to maintain high standards but not to achieve a predetermined economic result.

However, two points were made in favor of a conscious variation of admission requirements to conform to the market. Some of the delegates argued that an educational system which continually produces a larger number of lawyers than the economic system will support will turn out frustrated lawyers, "smart enough to become sour-bellies and revolutionaries," as well as profession-discrediting shysters. In addition, they urged, the law schools have a duty to spare the prospective student three years of agonizing effort if he will not succeed in gaining admission to the profession because of bar examiners who, in many places, do vary their standards in accordance with market factors. Proponents of these arguments consistently agreed that limitation of admissions should be solely by means of higher standards.

However, the substantial majority of this panel answered that the primary function of the law school is educational and not professional, and that neither legal education nor any other higher learning is harmful, though intense ambition to make a financial killing out of legal training may be. The delegates felt that much of the sentiment in favor of limiting admissions is based on an unduly narrow view of possibilities for the employment of lawyers. The national ratio of lawyers to population in 1947 was said to be lower than in the early Thirties, and ratios for certain states were reported to be as much as five times lower than the national figures. Even if it is a disservice to give a legal education to a man who will never be able to practice law, the delegates questioned the ability of the school to determine in advance of admission, or even in advance of graduation, what man will succeed in putting his legal training to remunerative use. Scholastic achievement in college sometimes fails to produce success in law school, and low-C men in law school often

outdo their law-review brethren in profitable employment. While not disputing the duty of the law school to exclude incompetents, the delegates denied the propriety of the law schools' drawing a higher line. Information on opportunities in the profession is, or can be made, as readily available to the prospective student as it is to the school administration, and the traditions of the American social order suggest that the decision ought to be his rather than theirs. Haphazard restrictions by individual schools based on individual analyses of the needs of the market pose a final, practical objection to pursuit of a restrictive policy by any one school.

The panel, therefore, adopted the Washington proposition in favor of accepting as law students all who meet the necessary minimum requirements of scholastic achievement and character.

C. Placement Policies

Some weight is lent to this conclusion of the Availability panel by the independent concurrence of the members of the Placement panel. This panel, debating the opposite side of the admissions problem, was more deeply concerned by the economic consequences of fairly unlimited admissions to law schools. Some delegates there suggested that a duty to find the graduate an economic niche in the community was imposed upon the school by its admission of a student and its failure to flunk him out. "I say a duty because these fellows have been stampeded into college—they have been stampeded by virtue of the G. I. Bill of Rights, which was designated and written for that purpose. . . . Now that duty is going to be on the educators or on the Veterans Administration." They argued that performance of that duty would begin by limiting admissions according to probable placement opportunities. Delegates from two schools indicated that restrictive admissions policies produced a satisfactory solution to their placement problems.

The Placement panel, however, rejected these arguments and, in fact, went a step beyond the Availability panel by advocating the elimination of economic considerations at the stage of admission to the bar as well.

In a discussion of the particular solutions of different schools and different states to the placement problem, and again in a discussion of the need to make legal services available to a wider segment of the public, individual delegates voiced their condemnation of such restrictive policies on the part of state boards of law examiners. For instance, in reference to the possibilities of admission to the bar in some counties in Pennsylvania, where "if you don't have a job waiting for you, you just don't get into the bar," the statement went unchallenged that "I think there is nobody here who would not admit that that is a very nasty

situation for a young lawyer coming from any part of the country." With reference to what could be done to increase the availability of legal services to the "middle group" in between those who can afford high fees and those who are eligible for legal aid, the chairman suggested that "we might go on record [as] condemning the Pennsylvania system of allowing the county bar associations, through their judges, to restrict arbitrarily the number of young men who have passed the bar examinations, who are yet not admitted to practice in their counties. . . . It cuts down the availability of legal services to people who need it, and it makes a closed corporation of the law practice in that county; and if you don't have the money to go to these lawyers, who naturally will then tend to charge higher and higher fees, you have no legal service for the great bulk of the people and you have no jobs for those of us who are getting out of law school, passing the bar examinations, and looking for a place to practice. . . . Whatever we might conclude about good restrictive policies, we know that [this] is bad and we don't want it." In summarizing the meeting the chairman stated, ". . . You did not approve of any exclusion methods practiced by the law schools or the bar examiners toward solving the placement problem by decreasing the number of men who are available. That definitely was the sense of the meeting."

It was not thought inconsistent with this conclusion, however, to advocate the counselling of students at the end of their first year as to their economic prospects on the basis of the indications afforded by their first-year work. "Warn the students what they are up against; show them that their opportunities lie in . . . other fields." This counselling should be done by the school's placement officer, who can draw on his experience in placing other men with comparable academic standing, and it would be legitimate for him to discourage from the further study of law those whose grades are so low as to make their prospects of obtaining legal employment slight.

But the obvious alternative solution to the problem of overcrowding, of which the panel seemed acutely conscious, is that of exploring new opportunities for the employment of legal talent. This alternative was favored by the panel. First among these opportunities is one indicated by the asserted fact "that the vast majority of the people in this country who really need legal aid are not getting it. . . . They are either frightened by the reputation that the law has in some quarters, or they don't have the money, or they are ashamed to go to a Legal Aid Society, which at best is patronizing. . . . If we can get those people legal assistance there will be an abundance of law practice for all of us." To tap this opportunity it was suggested that the Chicago Lawyer's Refer-

ence Plan be taken as an indication of how the layman's hostility and financial limitations can be overcome and how the many services which lawyers offer can be rendered to the man in the "middle group" before he reaches that ultimate point when "he is in real trouble."

A second largely untapped field for the employment of legal talent was suggested by the paper of the Wisconsin delegation submitted to this panel—namely, private practice in rural communities and cities of about 5,000, or less. The paper credits a 1945 Veterans' Bar Survey, conducted by the Wisconsin Bar Association, with the disclosure of approximately seventy-five communities in that state in which data on ratios of lawyers to population, real-estate values, incomes, bank deposits, and retail sales indicated freedom from overcrowding and openings for new men. In contrast to the pessimism of delegates from metropolitan centers over scarce law-office openings starting at "the going rate [of] about \$20 a week" and offering uncertain future prospects,⁶ the Wisconsin delegate held forth the opportunity of practice in a smaller community which, when fully developed, should yield incomes averaging from \$4,500 to \$6,500 a year. Although a lower limit upon the ultimate earnings prospect may tend to keep such "rural" practice uncrowded, provision of detailed information on rural opportunities should be useful in encouraging law graduates to take their talents to this market. Obtaining and collating such information would be a proper function of the law school's placement officer.

Finally, the Wisconsin paper suggests that opportunities in industry and government (particularly state governments during the present period of retrenched federal budgets) offer an alternative to the law graduate who finds himself facing a hopelessly overcrowded profession. The brightest side of this alternative is the usually higher starting salary for legal and administrative positions with either an industrial concern or a government agency. The paper estimated that one-third to one-half of the student body at Wisconsin anticipated taking this alternative.

The matter of obtaining a starting income in the practice of law sufficiently high to match the needs of one who may have exhausted his independent resources in law school, if he had any, received less than conclusive treatment by the panel. No hope was put upon the suggestions that alternative employment might so strip the supply of young lawyers as to raise the starting rate. Some delegates did urge that a direct correlation existed between the "\$20 per week" which law graduates might expect and the sum which, as a practical matter, their services might then be worth. To increase the starting rate it will be necessary,

⁶ According to a delegate from the University of Buffalo who was speaking of conditions in that vicinity.

among other things, to increase the graduate's practical usefulness by fuller training in law school in practical legal techniques and by a maximum amount of summer and spare-time experience in law-office apprenticeships. Another delegate suggested that law apprentices should organize and should approach the local bar associations with suggestions of a minimum apprentice-rate schedule to be incorporated in existing minimum-fee schedules. But a critic replied that an inherent difficulty faced unemployed law graduates who were "bucking for a minimum fee schedule. . . . You can't be in need of employment and asking for a raise at the same time."

A final suggestion for meeting the problem of overcrowding was made by one delegate who advocated legislation to reduce the unauthorized practice of law by accountants, banks, real-estate firms, and others, asserting that lawyers are consulted on less than 30 per cent of the legal business done in New York state. This suggestion was not taken up by other delegates.

D. Suggested Means

Implementation of these objectives by the law schools and their students received the greater share of the attention of both the Wisconsin paper and the panel discussion. Suggestions were based on the experiences of the individual schools represented, the Wisconsin experience being most fully stated. They fell into four categories:

1. Although some disputed it,⁷ most of the delegates felt that there was need for a placement officer in each law school. Of the seventeen schools represented on the panel, only six then had such an officer, and only Harvard and Columbia had full-time ones. Wisconsin's part-time officer, in addition to keeping students' experience and scholastic records and channeling the best fitted students into openings that are made known to the school, has made a thorough survey of practice opportunities in each community in the state, has approached agencies of the state government, and has made his services known to the law and industrial firms in the state which might be able to employ law graduates. Because of the impossibility of diverting academic funds of a state university to the work of a placement office, the Wisconsin officer's work has large-

⁷ Because the influx of law students under the G. I. Bill of Rights is abnormal and temporary, "within five or six years, I believe you are going to be right back where you were before, which means that the law schools do not require placement bureaus....And I don't think that the small school, like the one I come from [Albany Law School], has the financial background to institute a placement bureau. I don't think it would take effect for two or three years, and I think that by that time the supply would be down and the demand would be up and the placement bureau would cease to have any purpose at all."

ly been financed by a student organization supplemented by voluntary student clerical assistance.

In contrast to the law school's own placement officer, functioning as at Wisconsin, a delegate outlined the somewhat different effort being made at Notre Dame. The university's placement office is made available to law students, but offers the law school no separate services. The delegate pointed out that for students seeking employment in industry or government the university's placement office probably offered wider contacts than a separate law school office could provide. However, a student organization is creating a law school placement office on its own initiative, conducting surveys, informing law school alumni of its services, and cooperating with the university office in its efforts to place law graduates in law offices.

2. The "exploitation" of alumni is, of course, the core of the placement efforts of any school which has a fairly large body of alumni. There is a satisfaction to be had in counseling and in making openings for a graduate from one's own alma mater which insures a more interested reception to the placement officer's efforts than may be expected of other sources to which he may turn. Wisconsin has busied itself in building up the active membership of its alumni association and has stimulated interest in the law school by inviting alumni to an annual festival which provides an opportunity for the placement officer to make the details of his services known, to introduce alumni to students, and to expose the students to advice from alumni concerning placement opportunities.

One of the Harvard delegates explained his understanding of the admirable workings of the Yale system as he saw it operate in Providence. A prominent young Yale alumnus was appointed by the alumni association to represent the school's placement office in the city. A Yale graduate seeking a position in that city would be routed through the law offices and industrial firms by this alumnus, who would have prepared the way, at least where Yale men were to be found in those offices, in order to assure a receptive frame of mind. The man on the spot, an active member of the community to which the graduate was coming, had great advantages which a placement officer in New Haven, corresponding with prospective employers, could not have attained.

3. In addition to alumni festivals to bring the prospective employer into more intimate contact with law students, some schools have utilized other devices to carry those contacts outside the circle of their own alumni. At Western Reserve a "sponsor" system existed before the war, creating a voluntary relationship between a practicing attorney and each student, somewhat corresponding to that which exists in states

requiring law-student preceptors. Summer and part-time work for the sponsor are encouraged, giving the sponsor an opportunity to gain greater confidence in the ability of the student and the student a better opportunity to learn what will be expected of him in working for an older attorney. In return for freely given opportunities to visit the sponsor's office, to attend court with him, and generally to ride into the bar on his coattails, the students invited their sponsors to an annual dinner at the university. At Rutgers, a visiting lecture series brings practitioners to the school to address students on the subjects of placement opportunities, opening a law office, and the practice of law in their communities, and incidentally serves to make and maintain contacts between the school and the bar. A Wisconsin delegate gave his impression of the workings of Kentucky Law School's third-year briefing service for the practitioners in neighboring cities and towns. Through this service the ability and availability of law graduates are effectively brought to the attention of older men in practice.

4. A somewhat more controversial device was described as being in use at Columbia. In order to enable their placement officer to supply information as to personality qualifications, in addition to scholarship and other concrete law school attainments, a student committee appointed by responsible officers of the student government does "a sort of an O. C. S. system of personality rating" on each man, submitting it to the placement officer for inclusion in the confidential file which is offered to the prospective employer. The members of the rating committee are not known to their colleagues, and their ratings are confidential. But a degree of check on the system was felt, by the Columbia delegate, to be insured by the position of the placement officer, a professional personnel man, in the system. Other delegates thought the practice, which is still in its initial stages at Columbia, to be dangerous, and advocated that such ratings be made, if at all, by the professional man himself. However, the critics were unable to suggest how the professional man could supply the intimate knowledge of the student which only his colleagues have.

The panel's consensus favored each of these four types of approach.

II

CONTENT OF LEGAL EDUCATION

A. Curriculum

The subject matter which ought to be studied by a prospective lawyer in his undergraduate and in his law school days was necessarily touched upon in nearly all of the panels at the conference. The outline of the discussions in the Program Planning panel provides a framework into which most of the others can be fitted, and its discussions give balance to the others since it was the only panel which attempted to survey the over-all study program. Where this framework is incomplete, the outline of the panel on Instruction in Practical Craft Techniques provides a complement; however, that discussion will be reported in a later issue. The other panels which contributed to this topic were those on The Lawyer in Large Urban Centers, The Lawyer in Rural Communities and Smaller Urban Centers, The Lawyer in the International Field, The Lawyer in the Field of Labor, and The Lawyer in Public Life.

Pre-legal education and its integration with the law school program opened the discussion. The absence of law school guidance of pre-legal study invites a host of suggestions for more profitable utilization of the time which, many delegates felt with respect to their own pasts, had been wasted. In every branch of legal training, some skills and some background must be supplied at the expense of the intended substantive content, or the end-product will be less than adequate. An appreciation of the subject matter and an ability to integrate the content of various law courses makes preliminary study in English and American history, philosophy, and political theory important. In preparation for urban practice an increasingly thorough understanding of modern economics, trade practices, and investment values is essential both for an understanding of the rules of law studied and for effective service to a client.⁸ The rural lawyer, on the other hand, may deal with less complex problems of trade and finance but is far more certain to be thrown into the public life of his community, where his appreciation of social values and political and economic realities will be severely tried. For the study of law, as well as for most branches of its practice, some skills are necessary that may be learned in college. Such are English grammar

⁸ A questionnaire answered by ninety-five lawyers in cities of over one million indicated that, out of twenty-five selected fields of non-legal information, the following were most useful to them in the order given: (1) financial accounting (balance sheet, surplus, and income statement); (2) trade practices and methods; and (3) knowledge of the comparative merits of different types of investments. From the Harvard delegation's paper submitted to the Urban Lawyer panel. See also note 12 *infra*.

and construction, speaking and writing, and elementary accounting. Without accepting the asserted inability of law schools to add considerable learning in non-legal fields to their already crowded curricula, the delegates appeared unanimous in the opinion that pre-legal students should not remain in the dark as to what uses most profitably may be made of their undergraduate time.

An even division in the Program Planning panel resulted from the discussion of whether such pre-legal training should be required or merely recommended. Many of our best students have been men who decided to study law too late in their undergraduate days to conform to a required course of pre-legal study. Moreover, the desired stimulus to careful thought on important social issues may be hampered by requirements which will prevent the pre-legal student from selecting courses in his college's strongest departments. Some thought that the need would be adequately met by the law schools' recommending a course of undergraduate study and giving an aptitude test for admission to law school to eliminate those who missed parts of the prerequisite program and could not afford to do so. In the opinion of others, at least those of the desired courses which are designed to impart skills rather than information—English composition, public speaking, and accounting—might fairly be required of the entering law student even if the requirement forced him to delay law study an extra six months or more in order to acquire them. Still others argued that, if the law course is to be predicated on the assumption that a working knowledge of our social institutions, history, politics, and economics is brought with him by the entering student, it is conspicuously inconsistent merely to recommend, and not to require, the necessary pre-legal course of study. It was agreed that a definite statement from their intended law schools ought to describe a desirable pre-legal course of study, whether required or merely recommended, to pre-law students.

Should the transition from college studies to law school be facilitated by orientation courses, either in the college or in the first year of law school? Memories of first-year struggle and confusion are never dim in a law student's mind, and it is not surprising that by far the greater number of delegates who expressed themselves on this question opposed the traditional "sink or swim" introduction to law school. Columbia students reported favorably on their own experiences with the Legal Method course originated there, and the Program Planning panel's consensus adopted this course as the prototype for the introduction to law studies which it favored. A variation on this course's presentation, in which some of the Columbia delegates had participated, had special appeal. One first-year class studied this course under the guidance of a

selected group of upper-classmen, paid assistants to the faculty instructor. Each assistant met informally with an assigned fraction of the first-year class to give the tutorial assistance in adaptation to law studies which it is impossible for a single faculty member dealing with a large class to offer. The assistants, in turn, met weekly with the instructor. As Legal Method consumed the bulk of the time in the first weeks of the first year, tapering off thereafter, this system meant that bewilderment had an accessible remedy as quickly as it appeared and that false starts did not have to run their course before they were recognized and, the Columbia delegates believed, corrected.

The orientation and guidance efforts of other schools were reported. Some had adopted Legal Method, others Chicago's Elements of Law. Notre Dame supplemented the general courses with a "great books" course in Jurisprudence—maintaining an emphasis on intellectual development and a resistance to "spoon-feeding." Chicago also offered tutorial assistance through its first-year course in legal research; six faculty advisers for a class of about 100 students were able to offer an individual conference for each student as often as once a week.

Schools seeking to achieve individual guidance through less organized efforts than these of Chicago and Columbia did not succeed, in the opinion of their students. Faculty members assigned to groups of first-year men, to be "available" for counseling, are not approached as often as needed. Upperclass counterparts of the collegiate "big brother" are too immersed in their own work ever to "get around to the freshmen before they are sophomores."

Of the reasons assigned for advocating orientation courses and tutorial guidance, perhaps the most interesting was that offered by the Western Reserve paper on "Teaching Methods." The objective of law schools in the post-war era should be more than the preparation of practicing lawyers; it should include an aim to pass on ". . . a deep understanding and appreciation of the American philosophy of jurisprudence." Enlarged enrollments may continue even though the profession is unable to absorb all our present students into practice. They can be justified on the premise that law-trained citizens who do not practice law are better citizens for their law training. Granted that premise, it becomes less urgent for the law school to weed out those who may not become top-notch practitioners; economics will do that. The post-war law school should, on the contrary, do everything to encourage those who can, albeit only with assistance, meet the minimum academic standard.

The prevailing view was not without challenge. The Harvard authors of a paper submitted to the Urban Lawyer panel rejected the orientation course idea. In seeking to prepare the college graduate for

law study by methods already familiar to him, an orientation course would, they thought, necessarily defeat its own object. ". . . It would inevitably involve discussion of generalities at the very instant the student should be driven from them." ". . . There is no short-cut to legal facility, and . . . the shock of bewilderment is the most efficient attack on undergraduate habits of verbal and mental looseness and generalization." "The student would be harmed by a course which elaborately surveys the interrelation of sources of law and" becomes a work "of memorization rather than intellectual labor."

Turning to the rest of the law school curriculum, the Program Planning panel was faced by the proposition that decisions of the state bar examiners necessarily govern the content of law school curricula. The Detroit delegation offered the panel a comparison of two studies⁹ to demonstrate that the course offerings of forty-eight of the smaller American law schools show marked similarity to the bar-examination requirements of thirty-six of the forty-eight states. From this it was concluded that important changes in curricula "must either be instigated by the bar association or by making the course in law school longer so that more courses may be covered." This concern over the bar-examination requirements as obstacles to curricular changes met severe criticism; delegates from "national" law schools appeared to line up solidly against those from the "state" schools on this issue:

There seems to me to be too much emphasis on the bar exam. . . . If one knows that a course or a certain field is required for the bar exam, that seems to me to be a reason for not teaching it in law school . . . It must or will be acquired by the student before or at the time that he is taking the bar exam. Now at Columbia, there is no course in Bailments, Suretyship, Municipal Corporations, Carriers—oh, half a dozen other subjects which are taught in other law schools—and I can assure you that the boys get hold of a little book before the bar exam and learn it. . . . Something which will aid you in the practice of law, which the bar examiners neglect to examine you on, I think must be acquired in the law school in preference to things that will be required on the bar exam.

As the state law school delegates were, quite properly, a majority in all panels, their concern to have law courses prepare them specifically for a bar examination was a prevailing one.

On the other hand, the longer-course alternative was not popular either. Its best advocate was the Yale delegation, which urged it in connection with its proposals for the preparation of labor lawyers. Yielding to the general unwillingness to add another to the seven years of higher education now widely considered necessary to prepare a lawyer,

⁹ RULES FOR ADMISSION TO THE BAR (West Publishing Co., 1947); Leflar, *Survey of Curricula in Smaller Law Schools*, 9 AM.L.SCHOOL REV. 255 (1930).

this delegation proposed taking the extra year away from undergraduate work to make a 3-4 combination instead of the present 4-3. The loss in liberal arts education would be remedied by the law school's offering additional non-legal material, drawn from the social sciences. Its integration there with ordinary legal materials should enhance both its professional usefulness and the law student's understanding of legal principles. In advocating a fourth year of law school the Yale delegation was under the handicap of having had to prepare its argument in terms of the preparation of a labor lawyer—the topic assigned to Yale. The preparation it outlined was that of a specialist, although its four-year proposal contemplated corresponding additions to the curriculum for non-specialists as well. Opponents of the fourth year attacked the conclusion in the light of the reasons Yale offered: "I am definitely opposed to making me go another year simply for the purpose of allowing my next-door neighbor to become a specialist in labor law." Moreover, in the Program Planning panel the basis for the Yale compromise was undercut by a consensus favoring only three years of undergraduate study as preparation for the present three-year law school curriculum—six years in all. In the face of a criticism that economic considerations, which ought to be met with an economic remedy, were alone responsible for the panel's conclusion, the 3-3 plan carried the Program Planning panel and prevailed whenever it came into discussion in the other panels.

Within these two stringent limitations—the demand for bar-exam courses and the determination to keep the law course within the present three-year period—it is surprising not that the conference's curricular suggestions were conservative, but that it made any constructive suggestions at all. Perhaps a few suggestions were adopted without inquiry into whether they could be reconciled with those two limitations. At least one was accompanied by corresponding recommendations to the bar examiners.¹⁰ But one curricular proposal was developed in order to open possibilities for further changes within the limitations. This proposal was based on the premise that present curricula offer too many valuable, but essentially elementary, courses in such fields as insurance, corporations, bankruptcy, and trusts, to permit full coverage of the essentials for a general practice within three years. The proposal was to offer to upper-classmen condensations of all such courses, many of them third-year electives, so as to permit the prospective general practitioner to take them all. The chief obstacle to such streamlining would be removed by abandonment of the present devotion to case-system instruction, not in the first year, where it serves an important function in devel-

¹⁰ The Labor Lawyer panel advocated a required introductory course in Labor Law and proposed that the subject be required on bar examinations as well.

oping a skill, but in the succeeding years, where its inadequacies as a conveyor of information are, to students, notorious. Such condensations would permit not only wider coverage of essentials, but also greater leeway for the introduction of new matter which, in the eyes of some, is equally essential.

The suggested new matter would touch the present first year but lightly. The traditional Torts, Property, and Contracts introduction to substantive law met but one criticism. The Yale delegation argued that the "transfer value" of this training in fundamentals to modern specialties—particularly labor law—has been much overrated, to the detriment of the specialties. The frequent reluctance of parties to admit lawyers to labor-dispute mediations and arbitrations witnesses that ability to "think like a lawyer," without more, may be a handicap in some fields. The answer is not to abandon fundamentals, but to broaden their objectives to include that of studying law "in connection with the social institutions it serves." Such an objective should yield broader vision in the student who carries his learning in Torts into the Labor Relations seminar and, later, into collective-bargaining negotiations.

First-year procedure is apparently taught quite differently at different institutions. On the basis of reports that law school preparation in procedure is considered by practitioners to be of little use in practice, the Harvard course in Judicial Remedies, which has a historical rather than a practical purpose, was considered a desirable substitute. Criminal Law was thought by some to be worth more attention than it normally receives in the first year. For those intending to practice in smaller communities it has a highly practical significance; but for those who are not likely to be retained in ordinary criminal cases nor to become prosecuting attorneys, the delegates nevertheless urged a good criminal-law foundation, indorsing Dean Garrison's remark that "one of the blots upon the record of the legal profession, both in Great Britain and in this country, has been the almost supreme indifference with which it has regarded the system of criminal law, tossing it aside as something unclean and unprofitable."¹¹ A desirable accommodation of the two needs would be the Chicago plan, requiring of all students a course in theories of punishment and its administration, called Criminal Law Administration, and then offering upper-classmen, as an elective, a course in substantive Criminal Law.

The panel on the Urban Lawyer contributed certain fundamental but hotly disputed suggestions for the upper-class curriculum. It is noteworthy that although this panel directed its attention to the requirements

¹¹ In his address at the opening session.

of an urban practice its members could not agree that any fundamental differences from the requirements of a "rural" practice (*i. e.*, practice in rural communities and smaller urban centers) made their conclusions of peculiar relevance to the one rather than the other. Borrowing a concept, and its name, from some of Professor Lon L. Fuller's speeches, the Harvard delegation's paper urged greater attention to development in law students of "the capacity for total decision." Requirements of modern practice, its sources¹² indicate, call for more than the ability to determine what is the law, given the facts. Mastery of "forensic" facts—those confined to the four corners of a record—is not enough; in advising clients, in planning a course of action that will not merely answer the client's legal problems but also satisfy his business objectives, mastery of "managerial" facts becomes essential. "Given the law, what are the facts?"—how should the client's affairs be ordered so as to achieve the desired result?—characterizes the suggested approach.

The suggested reorientation of law teaching would lead to changes in teaching methods, but not in the curriculum in the first year. However, in the succeeding years curricular changes would be indicated. Basically the need is for greater informational content—as to business and financial practices, accounting methods, and economic principles—and for development of skill in applying such information to legal issues rather than in merely analyzing legal issues on the facts in a certain case. Such information might be acquired by diverting the student to courses offered in the schools of arts and sciences or business administration in the same university, or by introducing courses in Economics, Sociology, and Psychology into the law school's own offering. But as either of those approaches would be costly in time and inadequately integrated with the legal issues for which they would be needed, the Harvard proponents rejected them in favor of introduction of such non-legal material into the upper-class law courses. The law faculty, rather than the students, would bear the initial burden of acquiring the non-legal information and integrating it for the purposes of legal instruction. Casebooks, rather than separate texts, would contain the required information in text, notes, and in reproductions of material other than appellate court opinions.

Not only do the courses in Commercial Law, Business Associations, Trade Regulation, and Taxation require non-legal informational back-

¹² "Our limited knowledge of the professional task of the urban lawyer has been supplemented by the results of a questionnaire which was recently circulated among a sample of the alumni of Harvard Law School by a faculty committee on legal education. Although the sample was small, the results afford some factual background to this discussion." From the Harvard delegation paper. See also note 8 *supra*.

ground in order to develop the capacity for total decision; so do the property courses, dealing with planning and administering the disposition of estates, on the one hand, and the public-law courses on the other. For the property courses, information as to investment values and trends and understanding of the usual and the unusual motivations in family settlements are wanted; for public law, a better knowledge of the workings of our economy, of politics, of sociology and psychology (especially for criminal law study). And for all, the greatest success in practice and the most useful life as citizens require a better understanding than a technical approach to the subject matter alone will give of the value judgments which underlie the rules of law, the judicial decisions, the arguments of counsel, and the political pressures on legislators. To the social science material which must be taught to develop "the capacity for total decision" should be added the philosophy which should be included, not merely in a separate course in Jurisprudence, but in every substantive law course, in order both to develop that capacity and to turn out lawyers who are trained to become useful, leading citizens in any community. A professor countered that this demand for "policy-making" courses sounded "as if any course effectively taught by the case method is not already a policy course."¹³ Anticipating his argument, a Yale delegate admitted that a "great" teacher, "after giving the tools, broadens the picture by showing their place in society," but urged that "we should try to systematically work out methods available to every teacher, every student, and not to rely on a few 'great' teachers—intensively bringing in a body of knowledge which makes the whole legal process more understandable and makes for more effective action."

The limitations imposed by time and the bar examiners caused rough sledding for Harvard's proposition. Delegates admittedly convinced of the different modern role of the practicing lawyer, which was Harvard's premise, urged that the three-year law curriculum was not the place for this adjustment to it. Pre-legal education should be streamlined to assure the necessary informational background. Moreover, they maintained, business acumen cannot be taught in a law school; it can only be acquired after graduation. Providing the knowledge of law necessary to pass a bar examination and to engage in general practice is the function of the law school and will occupy the full three years. Compromise between this position and Harvard's was not achieved, nor did the panel commit itself to one position or the other in a statement of consensus. Perhaps some indication of the relative strength of the opposing views, however, was given by an informal vote taken on propositions as to how accounting should be taught to lawyers. That it should be the

¹³ Professor Harry W. Jones in an address at the concluding dinner.

subject of a separate law school course, specially designed for lawyers, was the least popular alternative. That it should be part of the informational content of a course in Business Associations was more widely favored; but that it should be recommended as a pre-legal study was almost unanimously favored. However, the questions were not presented as mutually exclusive alternatives, and the negative vote on each question was negligible.

The Rural Lawyer panel did not share the doubt that difference between "rural" and urban practice requires some essential differences in law school preparation. But while it did not use the expression "capacity for total decision," much of its discussion would have had a familiar ring to the Harvard delegation in the Urban Lawyer panel. The differences it saw would not have affected the need for integrating social science materials into law study. The two purposes of enhancing the student's understanding of the meaning of what he has learned and of better preparing him for a policy role in the life of his community were persuasive to the delegates in this panel. The counter-consideration of the time burden imposed by such additional material was perhaps more keenly felt by the Rural panel, since it was concerned to have the completest possible coverage of the strictly legal material in the curriculum as necessary preparation for general practice. Also, this panel had many ideas of its own for filling additional time with the teaching of practical craft techniques. On the other hand, preparation for public life, which the urban lawyer may take or may leave as he chooses, is more than an ordinary element of the rural lawyer's necessary equipment. "The country practitioner almost invariably becomes involved in public life," and law school preparation specifically directed to that end is almost as certain to be useful as is the study of Wills and Administration.

Two inconsistent views were expressed in the Rural Lawyer panel on this subject. One, developed by the delegate from Notre Dame, urged that this responsibility could be discharged only by the sort of teaching, especially in a course in Legal Ethics, that is directly aimed at instilling a high code of moral principles into the men who will be our future public servants. The other countered that the teacher's function is "to analyze the problems in the light of their social consequences and then let you draw your own conclusions and use your own value norm as to whether they are good or bad and what should be done about them." The "suggested course in legal ethics might degenerate into a course merely showing a man how far he could go . . . and stay in the bar association." Consensus in this panel, and on the identical issue in the

International Lawyer panel, left the Notre Dame delegation a minority of one in each case.

Two panels took up particular fields thought to be neglected in the ordinary law school curriculum and offered suggestions for curricular changes to remedy those specific neglects. They were the panels on the Labor Lawyer and on the International Lawyer. Each was introduced by an impressive study of the work of lawyers practicing in their fields and of the extent to which the work of general practitioners is likely to touch upon them, the purpose being to demonstrate the modern need for greater attention to these specialties in law schools. The comprehensive proposals of the Yale paper on the Labor Lawyer were also notable for constituting the only program of specialist's training advocated at the conference. This fact stimulated discussion in the Labor Lawyer panel as to whether the law school is the place for the development of any specialties, and whether they should be made available during the general course leading to the bachelor's degree or should be postponed to graduate work. The Yale proponents pointed out that we already regard the ordinary course in Corporations or Business Associations as inadequate preparation for the corporation lawyer, and do not require him to postpone his acquisition of knowledge of corporate finance, recapitalizations and reorganizations, and corporate tax problems until after graduation. Although practicing lawyers, even in the field of labor, do not advocate specialization in law school, their work belies their theories. They spend their time wholly occupied in highly technical work (the labor lawyer in activity requiring unusual skills—arbitrations, contract negotiations, civil rights and injunction litigation) for which their law school training has offered them no specific preparation. The result was characterized by one delegate as a bar of "would-be attorneys," men who would not, or could not, specialize in their law school careers and did not return after graduation to prepare for the work to which they give all their time.

Of course, most law schools are in no position to add a year's specialized training in labor law with their present limited facilities. Nor would many students be willing either to add a year to the present LL.B. course in order to permit specialization or to drop the necessary number of courses in other fields. Some agreed with the view ascribed to practitioners, that the fundamentals in Torts, Equity, Constitutional Law, and Administrative Law, combined with a single basic course in Labor Law, are adequate law school preparation for a specialist's career in labor law when supplemented by post-graduation experience in practice. The panel concluded, however, that the man who sought specialized law school training in labor law ought to be able to turn to one or a few

larger law schools and find the sort of course which the Yale paper envisaged, at least in graduate work.

The proposed specialized course would include one or, as at Yale, two basic courses in Labor Law, covering labor relations prior to the making of a collective-bargaining contract and relations under the contract. Integrated with the legal material in such courses would be a great deal of basic non-legal study of the history of the labor movement, economics of labor, political science, sociology, and psychology. Courses in Administrative Law, Legislation, Civil Liberties, Labor Injunctions, Labor Standards, and Workmen's Compensation would round out the substantive legal knowledge. To it should be added procedural and practical training, particularly in the field of arbitration. Several Yale courses in Arbitration and one called "Case Presentation" are directed to this end. After some discussion of this proposal, however, the panel recognized that it was too unwieldy a body, attempting to act in too limited a period of time, to adopt detailed proposals as to the content of a labor-law specialty. To the conference's continuation committee it recommended the creation of a law students' committee to make such a study, paralleling the work of the Association of American Law School's meeting of labor law teachers at Ann Arbor, Michigan, in June, 1947.

To the regular law school curriculum, the Labor Lawyer panel did recommend the addition, where not now present, of one basic course in Labor Law, which it felt to be a necessity for every law student. A majority of the panel delegates considered this subject important enough to be required in the curriculum and on the bar examinations.

Whether the further courses to be offered to the labor-law specialist should be available only at the graduate level or should be offered as part of a three-year curriculum (which would entail either dropping or severely condensing other courses usually thought essential) the panel did not resolve. The Yale paper's third alternative—adding a fourth year to the law curriculum—was rejected.

The International Lawyer panel had the benefit of information and suggestions made by a number of prominent international lawyers to the Columbia delegates and relayed to the panel in the Columbia paper. These lawyers reminded the Conference that the greatly increased international commerce of the United States and our greater participation in international affairs have brought about the possibility of international ramifications in many of the matters which almost every practitioner handles. Moreover, the lawyer's function as a citizen, a molders of public opinion, and a public servant increasingly demands of him a better background in international and comparative law than most present law

school curricula offer. Law school education should provide, they maintained, the ability to recognize the relevance of foreign law, treaty law, or the regulatory powers of international control boards to seemingly domestic problems. In addition to that basic aim, an awareness of the sources of such non-domestic law, a basis for understanding the results of research into such sources, and an ability to correspond intelligently with specialists and lawyers in foreign countries are among the needs of the non-specialist which law school education in international law and comparative law ought to supply. To this statement of the need and suggested objectives the Columbia paper added some information provided by the Committee on International and Foreign Law of the Association of American Law Schools on the present offerings of 101 law schools surveyed by that committee. Of fifty-two replies made to the committee's questionnaire, twenty-eight indicated that their schools gave courses in International Law and thirteen offered courses in Comparative Law. The committee's chairman was inclined to believe that most of the non-replying schools offered nothing in either field.

The panel expressed itself as convinced of the need thus outlined and of the desirability of the objectives stated. An unresolved controversy surrounded the suggested addition of another objective: that the rules of international and foreign law taught in basic courses offered to non-specialists should be presented in the light of the social values to which the international community or the foreign community adheres and which it seeks to implement through law. The proposal struck many as too demanding of schools which now offer nothing in the international field. The concern of such schools with bread-and-butter courses and with their respective states' bar-examination requirements is the product of student demand.¹⁴ If more than the minimum necessary to train their ordinary students in the fundamentals of international and comparative law is demanded, they will be unable to persuade their students to venture beyond the bread-and-butter level. The proponents replied that completely to ignore the social context of rules is to leave them barren of such significance as will enable the student to remember them, understand them, and make predictions based on them. It may be more feasible in a survey course to study the fundamentals of a legal system, in the light of its social context, than to study its more detailed ramifications without it. But in spite of agreement among the panel delegates that it was desirable to teach the social context of the legal systems studied, there was no agreement between the proponents and the objectors as to the feasibility of doing so in survey courses offered to non-specialists.

¹⁴ "Can the bull session. Let's learn some law. We've got bar exams coming up and we've got to make a living...."

In the discussion of comparative law as part of the basic law course, the suggestion that such study be integrated into the course material of, especially, the present commercial-law courses had wide appeal. At most, only a fraction of the specific rules of foreign systems of law can be added to the present law curriculum, and a Comparative Law course can dwell on only a few topics as illustrations of foreign legal systems. Such illustration might more profitably be undertaken in the substantive law courses, paralleling the study of corresponding Anglo-American principles. Moreover, the cost of this procedure would be only minor adjustments in the syllabus of each course, rather than the elimination of one or more courses from the student's program. This method was also favored by the specialists who advised the Columbia delegation. But confusion of students by throwing a mass of inconsistent rules and principles at them at once seemed a possible disadvantage, and the feasibility of requiring individual professors each to master the foreign law in his field and find material to add to his syllabus seemed to be a consideration beyond the competence of the panel to weigh. The panel's conclusion, therefore, was merely to recommend the addition of comparative law materials to present curricula in whatever manner the law faculties thought feasible for the attainment of the stated objectives. The panel saw no objection to making comparative law a required part of the curriculum, as the suggested integration would automatically do.

The Columbia paper suggested alternative ways of presenting international law: a full year course, a series of three one-semester courses (devoted to international law, international organizations, and international administrative agencies, respectively), and the abandonment of the subject to the pre-legal curriculum. Any one of them should be supplemented by further offerings to graduate students in those schools which can provide additional facilities. Only one of Columbia's specialist advisers favored relegating international law to the pre-legal course, and few of the panel delegates favored that solution. Some thought that the social-context foundation for the law school course might profitably be relegated to the undergraduate curriculum; but most of the delegates agreed, as did most of the specialists, that the choice between the first two alternatives, or others designed to meet the stated objectives, is one for the law faculties. The panel considered that its competence qualified it to go no farther than to conclude that international law merits attention in the law school's program for the general practitioner and that the present one-semester course offered in some schools is inadequate to the task.

[The remainder of the Conference Report will be published in the next issue of the JOURNAL. The other topics to be considered are Instruction in Practical Craft Techniques and Teaching Methods.]

